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INFORMATION MEMORANDUM

- To:** State and Territorial Lead Agencies administering the Child Care and Development Fund (CCDF) program, and other interested parties.
- Subject:** Child Care Consumer Education Website Requirements and Resources
- References:** The Child Care and Development Block Grant (CCDBG) Act, as amended (42 U.S.C. § 9857 *et seq.*); Section 418 of the Social Security Act (42 U.S.C. § 618); 45 CFR Parts 98 and 99.
- Purpose:** This Information Memorandum provides guidance and best practices to help state and territorial Lead Agencies design, implement, and maintain the required CCDF consumer education websites.
- Background:** CCDF awards funds to states, territories, and tribes to provide financial assistance to low-income working parents to access child care so they can work or attend job training or educational programs and to improve the quality of child care for all families. One of the purposes of the program is “to encourage states to provide consumer education information to help parents make informed choices about child care services and promote involvement by parents and family members in the development of their children in child care settings” (Section 658A(b)(3) of the CCDBG Act). This focus on consumer education as a crucial part of parental choice has laid the foundation for more transparency, helping parents to better understand their child care options and encouraging providers to improve the quality of their services.
- The reauthorization of the CCDBG Act in 2014 included new requirements and parameters related to consumer and provider education. These new requirements include sharing certain health and safety information online, giving parents information about other assistance programs for which they might be eligible, and helping parents and providers understand resources available to access developmental screenings. The 2016 CCDF final rule provides additional details about what must be included as part of consumer education, especially online. When implementing consumer and provider education provisions, Lead Agencies should consider three target audiences:

Parents, the general public, and child care providers. While some components are aimed at ensuring parents have the information they need to choose a child care provider, others are equally important for caregivers who regularly interact with parents and can serve as trusted sources of information.

The CCDBG Act of 2014 also required the U.S. Department of Health and Human Services (HHS) to design, develop, and maintain ChildCare.gov, a national website to help parents access safe and quality child care services in their community that best suits their family's needs.¹ ChildCare.gov refers users to state or territory child care consumer education websites that parents use to search for child care and consumer education information and relies on states and territories to keep the information on their child care consumer education websites up-to-date and easily accessible.

In FY 2016, the CCDF program served about 1.4 million children from 824,000 families each month.² Every interaction parents have with the subsidy system is an opportunity to engage them in consumer education to help them make informed decisions about their child care providers, as well as provide resources that promote healthy child development. Parents often lack the information necessary to make informed decisions about their child care arrangements. Low-income working families may face additional barriers when trying to find information about child care providers, such as limited access to the internet, limited literacy skills, limited English proficiency, or disabilities. CCDF Lead Agencies can play an important role in bridging the gap created by these barriers by providing information directly to families receiving CCDF subsidies to ensure they fully understand their child care options and are able to assess the quality of child care providers.

Consumer education, and especially the consumer education website, is able to reach beyond those families receiving child care assistance by providing information to the general public. Nearly 13 million children under the age of 5 regularly rely on child care to support their healthy development and future school success.³ Additionally, more than 10 million children participate in a range of school-age programs, before- and after-school and during summers and school breaks.⁴ Through public child care consumer education websites, states and territories have an opportunity to reach millions of families who may lack the support and information they need to find the right child care setting for their child.

¹ Additional information on the ChildCare.gov Project is available at <https://www.acf.hhs.gov/occ/childcaregov-project>.

² Office of Child Care. Administration for Children and Families. "FY 2016 Preliminary Table 1-Average Monthly Adjusted Number of Families and Children Served." Published March 12, 2018. <https://www.acf.hhs.gov/occ/resource/fy-2016-preliminary-data-table-1>.

³ Laughlin, Lynda. 2013. Who's Minding the Kids? Child Care Arrangements: Spring 2011. Current Population Reports, P70-135. U.S. Census Bureau, Washington, DC. <https://www.census.gov/prod/2013pubs/p70-135.pdf>.

⁴ Afterschool Alliance. 2014. America After 3PM: Afterschool Programs in Demand. Washington, DC. http://www.afterschoolalliance.org/documents/AA3PM-2014/AA3PM_National_Report.pdf.

Guidance: The reauthorization of the CCDBG Act expanded previously existing requirements related to consumer and provider education about child care. Section 658E(c)(2)(E) of the Act requires Lead Agencies to collect and disseminate, through child care resource and referral organizations or other means as determined by the Lead Agency, to parents of eligible children, the general public, and, where applicable, child care providers, consumer education information that will promote informed child care choices. The Act requires that certain pieces of this information be made available through a state website. In addition, Section 658E(c)(2)(D) requires monitoring and inspection reports of child care providers and the annual number of fatalities, serious injuries, and instances of substantiated child abuse and neglect that occur in child care settings be made available electronically. The CCDF final rule at § 98.33(a) combines and clarifies these provisions into the requirement for states and territories to create a consumer education website. The consumer education websites must be complete by September 30, 2018. All tribal grantees are exempt from the requirement to create a consumer education website.

This Information Memorandum outlines the required components of the consumer education website and provides additional guidance and best practices to help states and territories design, implement, and maintain useful websites.

Website Requirements

The consumer education website must be consumer-friendly and easily accessible. This means the materials should be in plain language and consider the abilities, languages, and literacy levels of the targeted audience. Lead Agencies should consider translation of materials into multiple languages, as well as the use of “taglines” for frequently encountered non-English languages and to inform persons with disabilities how they can access auxiliary aids or services and receive information in alternate formats at no cost.

Lead Agencies should make sure the website meets all Federal and State laws regarding accessibility, including the Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. 12101, *et seq.*) to ensure individuals with disabilities are not excluded, denied services, segregated or otherwise treated differently because of the absence of auxiliary aids and services. Auxiliary aids and services may include, but are not limited to, open and closed captioning and videotext displays for individuals with hearing loss or audio recordings and screen reader software for individuals who are blind or have low vision. The US Department of Justice has provided guidance and resources on how to make state and local government websites accessible to

people with disabilities at https://www.ada.gov/websites2_prnt.pdf. One option for Lead Agencies is to follow the guidelines laid out by section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794d) when designing their website. Section 508 requires that individuals with disabilities, who are members of the public seeking information or services from a Federal agency, have access to and use of information and data that is comparable to that provided to the public who are not individuals with disabilities.

The consumer education websites must include seven components. They are:

- Lead Agency policies for licensing and monitoring and inspecting child care providers, policies and procedures related to criminal background checks for child care providers, and the offenses that prevent individuals from serving as child care providers;
- Information on the availability of child care providers, searchable by zip-code;
- Quality of child care providers, if available for the provider;
- Provider-specific monitoring and inspection reports;
- Aggregate number of deaths and serious injuries (for each provider category and licensing status) and instances of substantiated child abuse in child care settings each year;
- Referral to local child care resource and referral organizations; and,
- Directions on how parents can contact the Lead Agency, or its designee, and other programs to better understand information on the website.

1. Lead Agency Policies and Procedures

The first required component of the consumer education website is a description of Lead Agency policies and procedures relating to child care. This includes explaining how the Lead Agency licenses child care providers, including the rationale for exempting providers from licensing requirements; the procedure for conducting monitoring and inspections of child care providers; policies and procedures related to comprehensive criminal background checks for staff members of child care providers; and the offenses that prevent individuals from being employed by a child care provider or receiving CCDF funds. The information about these policies should be in plain language. The final rule does not define plain language.

2. Availability of Child Care Providers

The second component is a localized list of all child care providers. The list must be searchable by zip code and differentiate whether a provider is licensed or license-exempt. This information must include all licensed child care providers. States may choose whether or not to include license-exempt providers serving children receiving CCDF assistance. Lead Agencies should

be mindful about the different types of license-exempt providers in their state that may wish to be included in the zip-code based search. For example, a license-exempt school-age program based at a school may still want to be included in the search. When making information public, Lead Agencies should ensure that the privacy of individual caregivers and children is maintained, consistent with state and local laws.

3. Quality of Child Care Providers

The third required component is provider-specific quality information, as determined by the Lead Agency, if that information is available for the provider. Lead Agencies may choose the best method for differentiating the quality levels of child care providers. For example, a state may use a quality rating and improvement system (QRIS) or other transparent system of quality indicators. Alternatively, states may choose to note in a provider's profile if they meet another quality measure, such as whether they have received a nationally recognized accreditation as an indicator of quality. Because not all eligible or licensed non-relative child care providers may be included in a transparent system of quality indicators or have access to accreditation or other quality measures, provider-specific quality information must only be posted on the consumer website if it is available for the individual provider.

4. Monitoring and Inspection Reports

The fourth website requirement is Lead Agencies must post provider-specific results of monitoring and inspection reports, including those reports that are due to major substantiated complaints about a provider's failure to comply with health and safety requirements and other policies. Lead Agencies must post the monitoring and inspection reports for all licensed child care providers, regardless of whether they serve children receiving CCDF, and all child care providers eligible to deliver CCDF services. Lead Agencies may exempt providers that are related to all the children in their care.

States must post full monitoring and inspection reports. In order for inspection results to be consumer-friendly and easily accessible, Lead Agencies must use plain language for all parents and child care providers and caregivers to understand. In the case that full reports are not in plain language, Lead Agencies must post a plain language summary or interpretation in addition to the full monitoring and inspection reports. Reports must include information about the date of inspection and information about any corrective actions taken by the Lead Agency and child care provider, where applicable. The reports must also prominently display any health and safety violations, including any fatalities or serious injuries that occurred at that child care provider. To highlight this information, Lead Agencies may choose to put these violations at the top of the report, using a different or bold font and/or a separate text box. Reports must be posted in a timely manner. The final rule

does not define timely but recommends reports be posted with 90 days of the monitoring visit or corrective action. Lead Agencies must post, at a minimum, three years of monitoring and inspection results, where available. Lead Agencies do not have to post reports retrospectively or prior to the effective date of this provision.

5. Aggregate Data

The fifth required component of the consumer education website is posting of the aggregate number of deaths, serious injuries, and instances of substantiated child abuse in child care settings each year. The aggregate data must include information about any child in the care of a provider eligible to receive CCDF, not just children receiving subsidies. The information on deaths and serious injuries must be separately delineated by category of provider (*e.g.*, centers, family child care homes) and licensing status (*i.e.*, licensed or license-exempt). The information should include: (1) the total number of children in care across the state or territory by provider category/licensing status; (2) the total number of deaths of children in care by provider category/licensing status; and (3) the total number of serious injuries in child care by provider category/licensing status. The aggregate number of substantiated instances of child abuse do not have to be separated by category of provider and licensing status.

6. Referrals

The sixth required component of the consumer education website is the ability to refer to local child care resource and referral organizations. The website should include contact information, as well as any links to websites for any local child care resource and referral organizations.

7. Contact Information

The seventh and final component of the consumer education website is information on how parents can contact the Lead Agency, or its designee, or other programs that can help the parent understand information included on the consumer education website.

Best Practices

In addition to the information required by the final rule, states and territories may consider adding other features that make their websites more informative, user-friendly, and easy to understand.

User Experience

An effective website should strive to be useful, clear, easy to use, and efficient. Users will be lost if the website does not: a) look professional; b) function in an efficient and effective way; and, c) appear attractive.

- The “Home” page: The “Home” page is the first impression a user will get when visiting the consumer education website. The most important factor in conveying an efficient impression is download time. The design and content on the “home” page needs to be clear and simple. Users should be able to see everything in front of them without having to make the effort of scrolling up and down.
- Navigation practices: Navigation is the functionality that facilitates movement from one web page to another web page. Providing “previous” and “next” buttons, and a “home” button on every page makes it easier for users to quickly move around the site. Navigation should be intuitive for users, meaning that when users see a function of the website such as a “search for child care” function, they know immediately what to do.
- Easily accessible content: Content should be easy to access and find. It should follow a natural progression allowing the user to move at their own direction and pace. Content should be broken up into easily digestible amounts. Pages that are only composed of scrolling text are difficult to follow and should be avoided. An internal search option is a key element in making a site’s content easily accessible.
- Limit “clicks:” Parents should be able to access all the consumer information they need to make an informed choice through a simple, single online source. For example, the required zip-code search should lead to a provider profile, which links to the provider’s monitoring and inspection reports, quality information, and other relevant information. When a single page is not an option, organize information so that items can be found in no more than three “clicks” or navigation steps.
- Avoid log-ins: Users want access to information as quickly as possible. Requiring a user to create a username and password to log-in simply to search for a child care provider in their area or to access monitoring and inspection reports creates an unnecessary barrier to information. Allowing users to create an account to save searches may be useful to parents, but this should not be required to access information. Parents may not be comfortable providing additional information to the site or simply not have time and may be driven away by the requirement for a log-in.

User-friendly Content

Clear content makes it easier for users to find what they need; understand what they find; and, use what they find to meet their needs.

- **Plain Language:** Child care provider monitoring and inspection reports must be in plain language or be accompanied by a plain language summary. This use of plain language should extend to all aspects of the consumer education website to help users fully understand the site's content. When writing in plain language, sentences should be short and direct and use present tense action verbs. The writer should also avoid jargon and use simple, familiar words. The [Federal Plain Language Guidelines](#) provide recommendations on organizing content, writing principles, and testing techniques.
- **Reading level:** The grade-level of the language used on the consumer education website should be appropriate for the target audience. Eighth grade reading level is widely accepted for information meant for the general public.⁵ For easier reading, aim for sixth grade level when developing content for parents. The Flesch-Kincaid readability test can be useful in measuring the grade-level of the content.
- **Readability:** Pages should be clear and easy to understand. It is important that the site is not too cluttered with text and images. The font size should also be large enough to be readable and clashing colors should be avoided.
- **Content presentation:** Content should be well presented through the appropriate use of text, graphics, and animation. It is important to use text, graphics, and animation as cleverly as possible to enhance the presentation while not taking too much from the site's performance.

Additional Information

The required components of the child care consumer education website are useful in providing families with the information they need to make informed decisions about child care. However, they are not comprehensive. In order to make a truly useful site, states and territories should look beyond the requirements and include additional resources.

- **Additional consumer education information:** Lead Agencies are required to provide child care consumer education information to parents, the general public, and child care providers beyond what the CCDF final rule requires be posted on the consumer education website. While this information does not have to be posted online, states and territories should consider including this information on the websites to provide parents with a single point of reference about child care in their state. The information that must be provided but not necessarily through the website are:

⁵ ECLKC. 2017. Website and Communication Standards: Plain Language Retrieved from <https://eclkc.ohs.acf.hhs.gov/web-standards/federalrequirements/plain-language.html>.

- The availability of child care and other early childhood programs for which parents might be eligible, including how to access financial assistance to obtain child care;
- Other programs for which the family might be eligible, such as Temporary Assistance for Needy Families (TANF), Head Start and Early Head Start, and the Supplemental Nutrition Assistance Program (SNAP);
- Programs carried out under the Individuals with Disabilities Education Act (IDEA);
- Research and best practices concerning children's development, meaningful parent and family engagement, and physical health and development;
- State and territory policies regarding social-emotional behavioral health of children, and policies to prevent suspension and expulsion of children birth to age five in child care and other early childhood programs; and,
- Information about existing resources and how parents and providers may access developmental screenings.
- Links to other services: The child care consumer education website provides an opportunity to give parents information about other services that may be useful to them beyond what is required in the final rule, including job training programs, medical services, and public schools in the area when children reach school-age. By including additional resources, states and territories can help parents access more information in a shorter time, making the state site a more useful tool and increasing traffic.

Tips and Guides for Users

In early care and education, the wide range of terminology can be confusing for parents and the general public to navigate. Providing tips and guides for website users will help them better understand the information provided and make them more confident consumers.

- Frequently asked questions (FAQs): States and territories should develop and provide consumers with answers to FAQs. Many topics covered by the FAQs may be addressed within other parts of the website. The additional explanations and clarifications about FAQs can provide families, providers, and the general public with greater understanding of intent and purpose as well as help to reinforce important information. For example, FAQs may include:
 - contact information for parents, such as who to contact to file a complaint, find a provider, or apply for benefits;
 - contact information for providers, such as who to contact to become licensed, find training, or check on subsidy payments;

- how to find information about the ADA and IDEA;
- where to find monitoring and inspection reports and the importance of the information contained in these reports;
- questions about concepts and details that may be frequently misunderstood, such as the differences in provider types and regulations;
- questions related to how to find quality child care, what should families look for when selecting a child care provider, and how to understand quality rating and improvement system levels; and
- questions about how to get help paying for and finding child care and child care assistance.
- Definitions: Clearly define key words and concepts that may not be familiar or easily understood by families, providers, or the general public. Test any assumptions about terms that are used on the website to make sure that the target audience understands the terms in the same way. Consider using a pop-up box or hover technology to define a keyword when a user first encounters the term on a webpage.

Quality Assurance

An up-to-date website with accurate content is critical to ensuring the website is useful and that users trust the posted information. Out-of-date information or inaccurate translations is not a useful resource for parents, the general public, or providers.

- Update website information: Implement an action plan for ongoing updates needed to the consumer education website. This plan should include processes for checking and fixing broken links, keeping provider data up to date, and making sure that state and local information, such as agencies providing child care resource and referral, are current.
- Translations and interpretations: Perform a rigorous quality review process for all written translations and recorded audio interpretations. Consider aspects such as spelling, grammar, punctuation, plain language, clarity, and cultural context.

User Input

In order to create a website that truly meets the needs of families, states and territories should seek out user input throughout the website design, implementation, and update process.

- Consultation: When designing the consumer education websites, states and territories should consult with parents, child care providers, and other stakeholders to ensure that the information being provided meets the needs of future users. This consultation can range from as simple as an online survey sent out to parents and providers to focus groups and website demonstrations with interested parties.
- Website feedback: The consumer education website should have a way for users to provide feedback about broken links, confusing content, or inaccurate information. This feedback may be collected through a user-support contact email, comment form, or survey once a user exits the site. States should have a clear process for updating errors or other issues once they have been identified by a user.

Technological Options

For the child care consumer education website to be helpful to a wide range of users, it needs to adapt to their technological needs and recognize that parents are often on the move and need to be able to take information with them.

- Responsive technology: Many parents use their smart phone or tablet to access the internet far more than they use a desktop or laptop computer. The child care consumer education website should meet parents where they are and be developed with “responsive web design.” This design allows for the widest viewing of web content on a wide range of smart devices. As part of the technology, the website content can automatically adjust pages and content to fit the smart device screen size.
- Printing: The website should include an option to print pages and resources in an easy to read format. Being able to print some of the resources on the child care website, such as provider contact information, monitoring reports, and quality check-lists, is especially important to make sure that parents are able to get the full benefit of the website, even when off-line.

Resources: The following resources provide additional information to help states and territories as they implement their child care consumer education websites:

- *Consumer Education Websites: A Guide to Creating a Family-Friendly Experience* (2018), by the National Center on Parent, Family and Community Engagement,
https://childcareta.acf.hhs.gov/sites/default/files/public/ce-websiteguide-508_3-16-18.pdf

- *Designing Family-Friendly Consumer Education on Child Care* (2017), by the National Center on Early Childhood Quality Assurance, https://childcareta.acf.hhs.gov/sites/default/files/public/designing_family_friendly_consumer_education_on_child_care.pdf
- *State and Territory Child Care Consumer Education Websites: Self-Assessment Checklist* (2018), by the Child Care State Capacity Building Center, https://childcareta.acf.hhs.gov/sites/default/files/public/state_and_territory_child_care_consumer_education_websites_self-assessment_checklist_0_0.pdf

Additional resources are available on the Office of Child Care's Consumer Education Resources Page, <https://www.acf.hhs.gov/occ/resource/consumer-education-resources>

Questions: Inquiries should be directed to the appropriate ACF Regional Office.

Attachment: Table A- Consumer Education Requirements and Best Practices

_____/s/_____
 Shannon Christian
 Director
 Office of Child Care

TABLE A- CONSUMER EDUCATION REQUIREMENTS AND BEST PRACTICES

Website Requirements	Other Consumer Education Requirements⁶	Website Best Practices
➤ Easily accessible and consumer-friendly	➤ Availability of child care services and other early childhood education programs	➤ User Experience <ul style="list-style-type: none"> ○ Home Page ○ Simple Navigation ○ Easily accessible content ○ Limited clicks ○ No required log-ins
➤ Access to widest possible families that speak languages other than English and persons with disabilities	➤ Other assistance programs for which a family may be eligible	➤ User-friendly Content <ul style="list-style-type: none"> ○ Plain language ○ Below 8th grade reading level ○ Readability ○ Content presentation
➤ Lead Agency policies and procedures	➤ Information about programs carried out under IDEA	➤ Additional child care information <ul style="list-style-type: none"> ○ Other required consumer education information ○ Links to other services
➤ Localized list of child care providers, searchable by zip code	➤ Research and best practices concerning children's development, meaningful parent and family engagement, and physical and healthy development	➤ Tips and Guides for Users <ul style="list-style-type: none"> ○ FAQs ○ Definitions
➤ Quality of the child care provider, if available for the provider	➤ Policies regarding the social-emotional behavioral health of children, and policies to prevent suspension and expulsion of children birth to age five in child care	➤ Quality Assurance <ul style="list-style-type: none"> ○ Regular updates ○ Translation and interpretation
➤ Monitoring and inspection reports	➤ Information on resources to access developmental screenings	➤ User Input <ul style="list-style-type: none"> ○ Focus groups ○ Website user feedback
➤ Annual aggregate data about the number of deaths, serious injuries, and instances of substantiated child abuse in child care settings		➤ Technological Options <ul style="list-style-type: none"> ○ Responsive technology ○ Printing
➤ Referrals to local resource and referral agencies		
➤ Contact Information for Lead Agency or designee		

⁶ Lead Agencies have flexibility to decide how to provide this information to parents, the general public, and child care providers and are not required to post it on the consumer education website.